

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In Re:

Bky. No. 02-90781

Jamco International, Inc.,

Chapter 7 Case

Debtor.

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**NOTICE OF HEARING AND MOTION FOR ALLOWANCE  
AND PAYMENT OF COMPENSATION AND REIMBURSEMENT FOR  
SPECIAL REPRESENTATION OF DEBTOR AND ESTATE  
(SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.)**

**TO: ALL PARTIES IN INTEREST AND OTHER ENTITIES AS SPECIFIED IN  
LOCAL RULES 2016-1 AND 9013-3(a)(1):**

1. Siegel, Brill, Greupner, Duffy & Foster, P.A. ("SBGDF"), hereby submits this motion for allowance and payment of compensation and reimbursement of expenses for its special representation of debtor and debtor's estate and gives notice of hearing.

2. The Honorable Gregory F. Kishel, Chief Judge of the U.S. Bankruptcy Court, will hear the following motion at 3:30 p.m. on November 8, 2004, or as soon thereafter as counsel may be heard, in Courtroom No. 228B, at the United States Courthouse, 316 N. Robert Street, St. Paul, MN 55101.

3. Pursuant to Local Rule 9006-1(b), any response to this motion must be filed and delivered not later than November 3, 2004, which is three days before the time set for hearing (excluding Saturdays, Sundays and holidays), or filed and served by mail not later than October 28, 2004, which is seven days before the date set for hearing (excluding Saturdays, Sundays and holidays), pursuant to Local Rule 9006(a). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THIS MOTION WITHOUT A HEARING.**

4. This Court has jurisdiction over this motion under 28 USC § § 157 and 1334, Fed. R. Bankr. P. 5005, and Local Rule 1070-1. This is core proceeding. The Petition commencing this Chapter 11 case was filed on April 5, 2002 and on May 27, 2003, this case was converted to a Chapter 7 bankruptcy. This case is now pending in this Court.

5. This motion arises under 11 USC § § 328, 330 and 331, Fed. R. Bankr. P. 2016 and Local Rule 2016.1. This motion is filed under Fed. R. Bankr. P. 9013 and Local Rule 9013-4(b). SBGDF requests an Order allowing and authorizing payment of its compensation for legal services and reimbursement of its expenses, as counsel for the debtor in possession for the period March 21, 2003 to August 14, 2003, and as counsel for the estate from the period August 15, 2003 to August 31, 2004 (the “Application Period”) in the total sum of \$19,538.60.

6. The debtor in possession applied to retain SBGDF as its attorney for a special purpose, and on March 21, 2003, an Order was entered authorizing SBGDF’s retention as counsel for the debtor in possession for a special purpose. A true and correct copy of the Order is attached hereto as Exhibit A. The special purpose for which SBGDF was retained was to pursue insurance claims against debtor’s insurance company, Assurance Company of America (hereinafter “Assurance”), arising out of an incident of water damage occurring at the debtor’s facility on December 9, 2002. SBGDF also provided services as to related issues including mechanics liens arising out of the failure of Assurance to honor the claim.

7. After the case was converted to a Chapter 7 bankruptcy proceeding, the bankruptcy trustee applied to the Court for an Order authorizing the employment of SBGDF as attorney for the estate, which Order was granted on August 14, 2003. A true and correct copy of the Order is attached hereto as Exhibit B. As a result of SBGDF’s services, the estate obtained a \$225,000 settlement from Assurance, which settlement has been approved by the Court without objection. The funds are expected to be received by the trustee in the near future.

8. SBGDF has not received a retainer in connection with its retention by the debtor in possession or the trustee for the estate. SBGDF has not previously been paid any amounts towards its services rendered for the debtor in possession or the estate, or its expenses incurred on behalf of them.

9. During the Application Period, SBGDF rendered professional services to the debtor in possession in connection with the Chapter 11 proceedings. The identity and hourly rates of the SBGDF attorney who rendered the services to the Committee is as follows:

<b>Timekeeper</b>	<b>Year</b>	<b>Rate</b>
M. Gregory Simpson	2003	\$225.00
M. Gregory Simpson	2004	\$250.00

10. SBGDF's professional services to the debtor-in-possession and debtor by its trustee are set forth in detail in monthly statements attached as Exhibit C hereto. All services included are believed to have been reasonable and necessary in the representation of the Debtor. The total amount sought for attorneys' fees for services rendered is \$19,487.50. The legal services provided, in narrative format, break down as follows:

<b>Date</b>	<b>Description</b>	<b>Total</b>
03-06-2003 through 04-21-2003	Initial and follow up meetings with debtor's principal; interviews and phone calls with witnesses; analysis of insurance policy and coverage issues; assistance to debtor with regard to mechanics' liens claims related to insurance work.	\$ 3,690.00 (16.4 hours)
04-23-2003 through 06-30-2003	Negotiation with Zurich Insurance regarding settlement of water damage claims and coverage issues; exchange of coverage analyses;	\$3,870.00 (17.2 hours)
07-01-2003 through 08-30-2004	Services at direction of John Hedback, Trustee in Bankruptcy, related to settlement of insurance claim with Zurich and miscellaneous legal issues identified by the Trustee.	\$12,040.00 (49.5 hours)
<b>TOTAL</b>		<b>\$19,487.50</b>

11. In addition, SBGDF has incurred actual and necessary expenses from March 6, 2003 to the present, for which it has not been reimbursed, in the total amount of \$51.10. All

included expenses are believed to have been reasonably and necessarily incurred in the representation of the Debtor. A detailed description of these expenses is included on the monthly statements attached as Exhibit C. The per unit charges for facsimile copies is \$.50 per page and for copies is \$.25 per page. The expenses are summarized as follows:

<b>Service</b>	<b>Amount</b>
Facsimile Copies	\$34.00
Photocopies	\$10.25
Long Distance Telephone Calls	\$6.85
<b>TOTAL</b>	<b>\$51.10</b>

12. SBGDF has made no prior motion for allowance of fees or expenses in connection with the debtor's bankruptcy case.

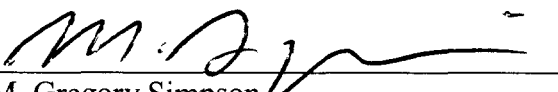
13. SBGDF certifies that the debtor, through its trustee, will receive and will have the opportunity to review this motion for Compensation and Reimbursement of expenses prior to any hearing thereon.

14. The trustee has informed SBGDF that he is in the process of reviewing claims and preparing tax returns, and that a final account will be prepared shortly. SBGDF is not aware of the extent of any other administrative expense obligations of the estate. The trustee has informed SBGDF that the estate has \$644,200 in cash on hand, not including the \$225,000 settlement with Assurance, which funds are expected to arrive in the near future.

**WHEREFORE**, SBGDF respectfully requests that an Order be entered herein allowing and authorizing payment to SBGDF, as special counsel for the debtor in possession and the estate, final compensation in the amount of \$19,538.60 for services rendered and expenses incurred during the Application Period. A proposed order is submitted herewith.

Dated: 10/18, 2004

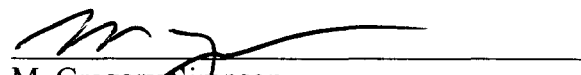
**SIEGEL, BRILL, GREUPNER, DUFFY  
& FOSTER, P.A.**

By:   
M. Gregory Simpson  
Attorney Reg. No. 204560  
1300 Washington Square  
100 Washington Avenue South  
Minneapolis, MN 55401  
(612) 337-6100

**VERIFICATION**

I, M. Gregory Simpson, a shareholder of Siegel, Brill, Greupner, Duffy & Foster, P.A.,  
named in the foregoing Notice of Hearing and Motion, declare under penalty of perjury that the  
foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on 10/18, 2004.

  
M. Gregory Simpson

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

---

In re:

Bky. No. 02-90781

Jamco International, Inc.

Chapter 11 Case

Debtor.

---

**ORDER AUTHORIZING EMPLOYMENT  
OF ATTORNEY FOR A SPECIAL PURPOSE**

Upon consideration of the Application of the Debtor in Possession in the above-captioned case, praying for approval of its employment of M. Gregory Simpson and the law firm of Siegel, Brill, Greupner, Duffy & Foster, P.A. to represent it for the special purpose set forth in the Application, and upon the Affidavit of M. Gregory Simpson which accompanies the Application, it appearing that the firm consists of attorneys duly admitted to practice in Minnesota and the Court being satisfied that neither M. Gregory Simpson, nor the members or professional employees of the law firm of Siegel, Brill, Greupner, Duffy & Foster, P.A. hold or represent any interest adverse to the Debtor or the Debtor's estate in the matters upon which they are to be engaged, and that it may be employed by the Debtor under 11 U.S.C. § 327(e), and that the employment of M. Gregory Simpson and the law firm of Siegel, Brill, Greupner, Duffy & Foster, P.A. would be in the best interest of the estate, it is hereby:

ORDERED that the employment by the Debtor in Possession of M. Gregory Simpson and the law firm of Siegel, Brill, Greupner, Duffy & Foster, P.A. and the respective members and professional employees of that firm to represent it as special counsel for the purpose described in the Application shall be, and it hereby is, approved, subject to the limitations on compensation provided by Title 11 United States Code, §328.

BY THE COURT

*1E/ Gregory F. Kishel*

Dated: 3/21, 2003

\_\_\_\_\_  
Gregory F. Kishel,  
Chief United States Bankruptcy Judge

NOTICE OF ELECTRONIC ENTRY AND FILING ORDER OR JUDGMENT Filed and Docket Entry made on 03/21/03 Patrick G. De Wane, Clerk, By lje
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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

BKY 02-90781

Jamco International, Inc.,

Debtor(s).

---

**ORDER**

On August 14, 2003, the Application to Employ M. Gregory Simpson of Siegel, Brill, Greupner, Duffy & Foster, P.A., as attorney of the estate came before the undersigned. Based on the Application, the Recommendation of the United States Trustee, and pursuant to the provisions of Title 11, United States Code, §327,

IT IS HEREBY ORDERED, the professional employment applied for is hereby approved subject to the limitations on compensation provided by Title 11, United States Code, §328.

Dated: 8/14/03

*1E1 Gregory C. Kishel*

United States Bankruptcy Judge

NOTICE OF ELECTRONIC ENTRY AND  
FILING ORDER OR JUDGMENT  
Filed and Docket Entry made on 08/14/03  
Patrick G. DeWane, Clerk, By lje

106-1

**EXHIBIT**

B

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 189592

DATE

8/01/03

BEW

23396BW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. ↓ Return this portion with your payment to the above address Thank you.

PREVIOUS BALANCE

.00

## PROFESSIONAL SERVICES

3/06/03	CONFERENCE WITH JAMES MACHEN;		67.50
	INITIALS: MGS HOURS:	.30	
3/07/03	CONFERENCE WITH JAMES MACHEN REGARDING MEETING; CONFERENCE WITH T. JOY; MEETING WITH JAMES MACHEN AND REVIEW FILE DOCUMENTS;		742.50
	INITIALS: MGS HOURS:	3.30	
3/10/03	CONFERENCE WITH TOM FLYNN REGARDING STATUS; LETTER TO TOM FLYNN TO GET HIRED; REVIEW CLIENT MATERIALS;		337.50
	INITIALS: MGS HOURS:	1.50	
3/13/03	CONFERENCE WITH JAMES MACHEN;		90.00
	INITIALS: MGS HOURS:	.40	
3/14/03	REVIEW APPLICATION TO HIRE COUNSEL FOR SPECIAL PURPOSE;		112.50
	INITIALS: MGS HOURS:	.50	
3/14/03	REVIEW FILE MATERIALS;		517.50
	INITIALS: MGS HOURS:	2.30	
3/17/03	LETTER TO TOM FLYNN WITH MATERIALS;		45.00
	INITIALS: MGS HOURS:	.20	
3/26/03	REVIEW NOTICE OF APPROVAL AS COUNSEL; CONFERENCE WITH TOM FLYNN; REVIEW MECHANICS LIEN MATERIALS FROM SAME;		157.50
	INITIALS: MGS HOURS:	.70	
3/27/03	DRAFT LETTER TO T. JOY; LEGAL RESEARCH;		945.00
	INITIALS: MGS HOURS:	4.20	
3/28/03	REVIEW FILE INFORMATION;		67.50
	INITIALS: MGS HOURS:	.30	
3/31/03	REVIEW FAX FROM CLIENT; LETTER TO CLIENT;		180.00
	INITIALS: MGS HOURS:	.80	
4/10/03	CONFERENCE WITH J. MACHEN REGARDING STATUS;		45.00
	INITIALS: MGS HOURS:	.20	
4/18/03	CONFERENCE WITH JAMES MACHEN; ATTEMPTS TO LOCATE INSURANCE CARRIER;		270.00
	INITIALS: MGS HOURS:	1.20	

**EXHIBIT** C



SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

PAGE 2  
STATEMENT NO. 189592DATE 8/01/03  
23396BW BEW  
ZURICH AMERICAN INS.JAMCO INC.  
PO BOX 66  
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MN 55318

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PREVIOUS BALANCE

4/21/03	CONFERENCE TO LOCATE INSURANCE AGENT; CONFERENCE WITH JAMES MACHEN REGARDING STATUS;	INITIALS: MGS HOURS: .50	112.50
4/23/03	CONFERENCE WITH JAMES MACHEN REGARDING STATUS; CONFERENCE WITH TERRY JOY;	INITIALS: MGS HOURS: .80	180.00
4/28/03	CONFERENCE WITH J. MACHEN REGARDING STATUS; REVIEW FILE MATERIALS; CONFERENCE WITH T. JOY REGARDING SETTLEMENT;	INITIALS: MGS HOURS: 1.20	270.00
4/29/03	CONFERENCE WITH C. JOHNSON; CONFERENCE WITH J. MACHEN; CONFERENCE WITH T. JOY REGARDING SETTLEMENT;	INITIALS: MGS HOURS: 2.50	562.50
4/30/03	CONFERENCE WITH J. MACHEN REGARDING STATUS; CONFERENCE WITH T. JOY, ETC.;	INITIALS: MGS HOURS: 1.30	292.50
5/01/03	CONFERENCE WITH CHAD JOHNSON AND J. MACHEN REGARDING STATUS; CONFERENCE WITH T. JOY REGARDING SETTLEMENT;	INITIALS: MGS HOURS: 1.30	292.50
5/02/03	CONFERENCE WITH J. MACHEN REGARDING STATUS; CONFERENCE WITH T. JOY;	INITIALS: MGS HOURS: .50	112.50
5/05/03	CONFERENCE WITH JAMES MACHEN; CONFERENCE WITH T. JOY REGARDING SETTLEMENT;	INITIALS: MGS HOURS: .50	112.50
5/06/03	CONFERENCE WITH J. MACHEN AND T. JOY REGARDING SETTLEMENT;	INITIALS: MGS HOURS: .30	67.50
5/07/03	CONFERENCE WITH T. JOY REGARDING SETTLEMENT; CONFERENCE WITH J. MACHEN AND WIFE REGARDING SETTLEMENT;	INITIALS: MGS HOURS: 1.50	337.50
5/08/03	CONFERENCE WITH J. MACHEN; CONFERENCE WITH CHAD JOHNSON; CONFERENCE WITH T. JOY REGARDING MISCELLANEOUS ISSUES;	INITIALS: MGS HOURS: 1.50	337.50

58910

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

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MINNEAPOLIS, MINNESOTA 55401

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PAGE 3  
STATEMENT NO. 189592

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23396BW  
ZURICH AMERICAN INS.

JAMCO INC.  
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## PREVIOUS BALANCE

5/09/03	REVIEW TRANSACTION DOCUMENTS; CONFERENCE WITH J. MACHEN; CONFERENCE WITH SCOTT SALITERMAN;	INITIALS: MGS HOURS: 2.80	630.00
5/12/03	CONFERENCE WITH SCOTT SALITERMAN REGARDING SALE OF JAMCO PROPERTY;	INITIALS: MGS HOURS: .50	112.50
5/13/03	CONFERENCE WITH CHAD JOHNSON REGARDING LIEN;	INITIALS: MGS HOURS: .50	112.50
5/17/03	CONFERENCE WITH J. MACHEN;	INITIALS: MGS HOURS: .20	45.00
5/19/03	CONFERENCE WITH SCOTT SALITERMAN AND J. MACHEN REGARDING DEAL;	INITIALS: MGS HOURS: .50	112.50
5/22/03	CONFERENCE WITH J. MACHEN REGARDING STATUS;	INITIALS: MGS HOURS: .20	45.00
5/23/03	CONFERENCE WITH BILL WEBSTER REGARDING ZURICH'S POSITION;	INITIALS: MGS HOURS: .30	67.50
5/28/03	CONFERENCE WITH J. MACHEN REGARDING STATUS;	INITIALS: MGS HOURS: .20	45.00
5/29/03	CONFERENCE WITH J. MACHEN REGARDING STATUS;	INITIALS: MGS HOURS: .20	45.00
6/26/03	CONFERENCE WITH J. MACHEN REGARDING OPINION ON SUIT;	INITIALS: MGS HOURS: .20	45.00
6/30/03	CONFERENCE WITH JIM MACHEN;	INITIALS: MGS HOURS: .20	45.00
7/01/03	CONFERENCE WITH JOHN HEDBACK REGARDING STATUS;	INITIALS: MGS HOURS: .60	135.00
7/31/03	REVIEW LETTER FROM RKMC; CONFERENCE AND LETTER TO JOHN HEDBACK REGARDING STATUS; CONFERENCE WITH T. JOY, LMTG;	INITIALS: MGS HOURS: .80	180.00
CURRENT FEES:			7,875.00

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

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PAGE 4  
STATEMENT NO. 189592

DATE 8/01/03

23396BW BEW  
ZURICH AMERICAN INS.JAMCO INC.  
PO BOX 66  
CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

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PREVIOUS BALANCE

## DISBURSEMENTS

3/10/03 FACSIMILE COPIES	1.00
3/19/03 FACSIMILE COPIES	1.00
3/27/03 TELEPHONE CALL; ATLANTNHST, GA	6.85
3/31/03 PHOTOCOPIES	2.50
5/01/03 PHOTOCOPIES	4.75
CURRENT DISBURSEMENTS:	16.10

CURRENT BALANCE: 7,891.10

## LAW OFFICES

**SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.**  
 1300 WASHINGTON SQUARE  
 100 WASHINGTON AVENUE SOUTH  
 MINNEAPOLIS, MINNESOTA 55401  
 TELEPHONE (612) 337-6100  
 TELECOPIER (612) 339-6591  
 TAX ID NO. 41-1626742

STATEMENT NO. 190405

DATE 9/30/03

23396BW  
 ZURICH AMERICAN INS.

BEW

JAMCO INC.

PO BOX 66

CHASKA MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE 7,891.10

## PROFESSIONAL SERVICES

8/07/03	REVIEW LETTER FROM HEDBACK; EXECUTE AND RETURN DISCLOSURE; LETTER TO J. JOY WITH EXAMINATION UNDER OATH;	135.00
	INITIALS: MGS HOURS: .60	
8/11/03	REVIEW LETTER FROM HEDBACK; CONFERENCE WITH HEDBACK; REVIEW FILE;	112.50
	INITIALS: MGS HOURS: .50	
9/09/03	RESEARCH REGARDING EXAMINATION UNDER OATH; REVIEW FILE;	517.50
	INITIALS: MGS HOURS: 2.30	
9/10/03	REVIEW FILE MATERIALS;	517.50
	INITIALS: MGS HOURS: 2.30	
9/11/03	REVIEW FILE; DRAFT LETTER TO HEDBACK;	1,395.00
	INITIALS: MGS HOURS: 6.20	
9/15/03	CONFERENCE WITH JOHN HEDBACK REGARDING LETTER;	45.00
	INITIALS: MGS HOURS: .20	
9/16/03	CONFERENCE WITH JOHN HEDBACK;	45.00
	INITIALS: MGS HOURS: .20	
9/22/03	CONFERENCE WITH J. HEDBACK REGARDING STATUS; REVIEW FILE MATERIAL;	180.00
	INITIALS: MGS HOURS: .80	
9/29/03	REVIEW LETTER FROM INSURANCE COMPANY;	45.00
	INITIALS: MGS HOURS: .20	
	CURRENT FEES:	2,992.50

## DISBURSEMENTS

9/11/03	FACSIMILE COPIES	4.00
	CURRENT DISBURSEMENTS:	4.00

LAW OFFICES

**SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.**

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742


**PAGE 2**  
**STATEMENT NO. 190405**

**DATE 9/30/03**  
**23396BW BEW**  
**ZURICH AMERICAN INS.**

**JAMCO INC.**  
**PO BOX 66**  
**CHASKA**

**MN 55318**

Amount Remitted \$ \_\_\_\_\_

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---

PREVIOUS BALANCE

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**CURRENT BALANCE: 10,887.60**

## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 190701

DATE 10/31/03

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.  
PO BOX 66  
CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

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PREVIOUS BALANCE 10,887.60

## PROFESSIONAL SERVICES

0/07/03	REVIEW NOTICE OF CONTINUANCE; CONFERENCE WITH JOHN HEDBACK; DICATION LETTER TO T. JOY; REVIEW BANKRUPTCY WEBSITE FOR STATUS;	292.50
	INITIALS: MGS HOURS: 1.30	
0/09/03	CONFERENCE WITH CLIFF LOZINSKI; CONFERENCE WITH JOHN HEDBACK;	112.50
	INITIALS: MGS HOURS: .50	
0/16/03	CONFERENCE WITH CLIFF LOZINSKI REGARDING DOCUMENTS;	67.50
	INITIALS: MGS HOURS: .30	
0/29/03	REVIEW FILE FOR RESPONSIVE MATERIALS;	67.50
	INITIALS: MGS HOURS: .30	
	CURRENT FEES:	540.00

CURRENT BALANCE: 11,427.60

LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

STATEMENT NO. 191102

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

23396BW

DATE

ZURICH AMERICAN INS.

11/30/03

BW

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. ↓ Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE

~~11,427.60~~

PROFESSIONAL SERVICES

1/26/03 DRAFT RESEARCH FORMAT FOR APPLICATION FOR PAYMENT;

112.50

INITIALS: MGS HOURS: .50

CURRENT FEES:

112.50

CURRENT BALANCE: 11,540.10

LAW OFFICES

SIÉGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 191564

DATE

12/31/03

23396BW

BEW

ZURICH AMERICAN INS.


JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here.  Return this portion with your payment to the above address. Thank you.

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PREVIOUS BALANCE 11,540.10

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PROFESSIONAL SERVICES

/03/03 CONFERENCE WITH SARAH MACDONALD REGARDING FEE PETITION; 67.50  
INITIALS: BEW HOURS: .30

CURRENT FEES: 67.50

CURRENT BALANCE: 11,607.60



## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

STATEMENT NO. 19264

DATE

1/31/0

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here ↓ Return this portion with your payment to the above address. Thank you

PREVIOUS BALANCE 11,607.60

## PROFESSIONAL SERVICES

1/21/04	CONFERENCE AND LETTER TO JOHN HEDBACK; REVIEW FILE MATERIALS AND BANKRUPTCY STATUS;	200.00
	INITIALS: MGS HOURS: .80	
1/22/04	CONFERENCE WITH JOHN HEDBACK; LETTER TO HEDBACK; DRAFT LETTER REGARDING SETTLEMENT; RESEARCH COVERAGE ISSUES;	950.00
	INITIALS: MGS HOURS: 3.80	
1/23/04	REVISE LETTER TO T. JOY; RESEARCH POLICY ISSUES; SUMMARIZE MACHEN EXAMINATION UNDER OATH;	700.00
	INITIALS: MGS HOURS: 2.80	
1/26/04	CONFERENCE WITH J. HEDBACK; SUMMARIZE MACHEN DEPOSITION AND REVIEW FILE MATERIALS;	575.00
	INITIALS: MGS HOURS: 2.30	
1/27/04	CONFERENCE WITH JOHN HEDBACK REGARDING APPROVAL TO ISSUE DEMAND; REVISE AND SEND DEMAND LETTER TO T. JOY;	325.00
	INITIALS: MGS HOURS: 1.30	
1/29/04	REVIEW LETTER FROM HEDBACK APPROVING SETTLEMENT OVERTURE; SUMMARIZE MACHON DEPOSITION; REVIEW CLIENT DOCUMENTS; DRAFT LETTER TO HEDBACK;	425.00
	INITIALS: MGS HOURS: 1.70	
1/30/04	FINALIZE AND SEND LETTER TO HEDBACK REGARDING MISCELLANEOUS COVERAGES; FINALIZE REVIEW OF MACHEN DEPOSITION;	425.00
	INITIALS: MGS HOURS: 1.70	
	CURRENT FEES:	3,600.00

## DISBURSEMENTS

1/22/04	FACSIMILE COPIES	5.00
1/23/04	FACSIMILE COPIES	4.50
	CURRENT DISBURSEMENTS:	9.50

LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

PAGE  
STATEMENT NO. 19264

DATE 1/31/0  
23396BW BEW  
ZURICH AMERICAN INS.

JAMCO INC.  
PO BOX 66  
CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here ↓ Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE

CURRENT BALANCE: 15,217.10

## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 19303

DATE

2/29/0

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55308

Amount Remitted \$ \_\_\_\_\_

Please detach here. Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE

15,217.10

## PROFESSIONAL SERVICES

2/09/04 CONFERENCE WITH T. JOY REGARDING STATUS;	50.00
INITIALS: MGS HOURS: .20	
2/10/04 CONFERENCE WITH T. JOY REGARDING SETTLEMENT; CONFERENCE WITH	
J. HEDBACH REGARDING SETTLEMENT;	125.00
INITIALS: MGS HOURS: .50	
CURRENT FEES:	175.00

CURRENT BALANCE: 15,392.10

LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742


STATEMENT NO. 19343

23396BW DATE 3/31/0  
ZURICH AMERICAN INS. BEW

JAMCO INC.  
PO BOX 66  
CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here  Return this portion with your payment to the above address. Thank you

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PREVIOUS BALANCE	15,392.10
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CURRENT BALANCE: 15,392.10

LAW OFFICES

SIÉGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 19396

DATE

4/30/0

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. ↓ Return this portion with your payment to the above address. Thank you.

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PREVIOUS BALANCE	15,392.10
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CURRENT BALANCE: 15,392.10

## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

STATEMENT NO. 19419

DATE

5/31/0

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here | Return this portion with your payment to the above address. Thank you

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PREVIOUS BALANCE 15,392.10

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## PROFESSIONAL SERVICES

5/19/04	LETTER TO J. HEDBACK REGARDING STATUS; LETTER TO T. JOY REGARDING DEMAND FOR SETTLEMENT; REVIEW FILE REGARDING INSURANCE COVERAGES;	550.00
	INITIALS: MGS HOURS: 2.20	
5/21/04	CONFERENCE WITH T. JOY OFFERING \$200,000; CONFERENCE WITH JOHN HEDBACK REGARDING SAME;	200.00
	INITIALS: MGS HOURS: .80	
5/24/04	CONFERENCE WITH JOHN HEDBACK REGARDING SETTLEMENT AND AUTHORIZING COUNTEROFFER OF \$250,000;	125.00
	INITIALS: MGS HOURS: .50	
5/27/04	TELEPHONE CONFERENCE WITH T. JOY REGARDING COUNTER OFFER OF \$250,000; REVIEW FILE REGARDING COVERAGE;	175.00
	INITIALS: MGS HOURS: .70	
5/28/04	TELEPHONE CONFERENCE WITH T. JOY REGARDING \$225,000 "TOP OFFER;" TELEPHONE CONFERENCE TO J. HEDBACK REGARDING SAME;	125.00
	INITIALS: MGS HOURS: .50	
	CURRENT FEES:	1,175.00

CURRENT BALANCE: 16,567.10

## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

STATEMENT NO. 104854

DATE

6/30/04

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE

16,567.10

## PROFESSIONAL SERVICES

6/01/04	CONFERENCE WITH JOHN HEDBACK REGARDING SETTLEMENT AMOUNT ACCEPTABLE; AUTHORIZING SETTLEMENT AT \$225,000;	125.00
	INITIALS: MGS HOURS: .50	
6/04/04	CONFERENCE WITH TERRY JOY REGARDING PROCEDURE FOR SETTLEMENT;	300.00
	INITIALS: MGS HOURS: .40	
6/17/04	CONFERENCE WITH JOHN HEDBACK REGARDING RELEASE; RESEARCH MISCELLANEOUS LEGAL ISSUES FROM TRUSTEE;	225.00
	INITIALS: MGS HOURS: .90	
6/23/04	CONFERENCE WITH JOHN HEDBACK REGARDING MISCELLANEOUS LEGAL ISSUES; RESEARCH REGARDING SAME;	300.00
	INITIALS: MGS HOURS: 1.20	
6/25/04	DRAFT LETTER TO HEDBACK REGARDING MISCELLANEOUS LEGAL ISSUES; ANALYZE POLICY FOR COVERAGE OF PAINTINGS; CONFERENCE WITH HEDBACK;	375.00
	INITIALS: MGS HOURS: 1.50	
6/29/04	CONFERENCE WITH JOHN HEDBACK REGARDING MISCELLANEOUS LEGAL ISSUES;	275.00
	INITIALS: MGS HOURS: 1.10	
	CURRENT FEES:	1,400.00

## DISBURSEMENTS

6/15/04	FACSIMILE COPIES	5.00
6/29/04	FACSIMILE COPIES	7.00
	CURRENT DISBURSEMENTS:	12.00

LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY & FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS, MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO. 41-1626742

PAGE

STATEMENT NO.

19485

DATE

6/30/0

23396BW

BW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here. Return this portion with your payment to the above address. Thank you.

PREVIOUS BALANCE

CURRENT BALANCE: 17,979.10



## LAW OFFICES

• SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

STATEMENT NO. 19527

DATE

7/31/04

23396BW

BEW

ZURICH AMERICAN INS.

JAMCO INC.

PO BOX 66

CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here | Return this portion with your payment to the above address. Thank you

PREVIOUS BALANCE

17,979.10

## PROFESSIONAL SERVICES

7/02/04	DRAFT AND SEND RESEARCH LETTER TO JOHN HEDBACK REGARDING MISCELLANEOUS LEGAL ISSUES;		575.00
	INITIALS: MGS	HOURS: 2.30	
7/09/04	CONFERENCE WITH JOHN HEDBACK REGARDING STATUS; REVIEW LETTER FROM T. JOY REGARDING STATUS;		175.00
	INITIALS: MGS	HOURS: .70	
7/26/04	CONFERENCE WITH JOHN HEDBACK REGARDING STATUS -- CONTRACT HE FOUND REGARDING AGREEMENT OF JAMCO TO BUY PAINTINGS; REVIEW COVERAGE ON PAINTINGS;		325.00
	INITIALS: MGS	HOURS: 1.30	
	CURRENT FEES:		1,075.00

## DISBURSEMENTS

7/01/04	PHOTOCOPIES	1.50
7/02/04	FACSIMILE COPIES	2.00
7/30/04	PHOTOCOPIES	1.50
	CURRENT DISBURSEMENTS:	5.00

CURRENT BALANCE: 19,059.10

## LAW OFFICES

SIEGEL, BRILL, GREUPNER, DUFFY &amp; FOSTER, P.A.

1300 WASHINGTON SQUARE

100 WASHINGTON AVENUE SOUTH

MINNEAPOLIS MINNESOTA 55401

TELEPHONE (612) 337-6100

TELECOPIER (612) 339-6591

TAX ID NO 41-1626742

STATEMENT NO. 19579

23396BW DATE  
ZURICH AMERICAN INS.8/31/04  
BEWJAMCO INC.  
PO BOX 66  
CHASKA

MN 55318

Amount Remitted \$ \_\_\_\_\_

Please detach here | Return this portion with your payment to the above address. Thank you

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PREVIOUS BALANCE 19,059.10

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## PROFESSIONAL SERVICES

8/02/04 LETTER TO T. JOY REGARDING SETTLEMENT AGREEMENT; REVISE AGREEMENT;	375.00
INITIALS: MGS HOURS: 1.50	
8/04/04 REVIEW LETTERS FROM T. JOY; CONFERENCE WITH T. HEDBACK REGARDING STATUS;	100.00
INITIALS: MGS HOURS: .40	
CURRENT FEES:	475.00

## DISBURSEMENTS

8/02/04 FACSIMILE COPIES	4.50
CURRENT DISBURSEMENTS:	4.50

CURRENT BALANCE: 19,538.60

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In Re:

BKY 02-90781

Jamco International, Inc.

Debtor

**PROOF OF SERVICE**

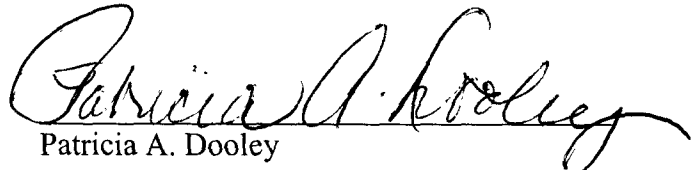
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The undersigned states that she is an employee of Siegel, Brill, Greupner, Duffy & Foster, P.A., and in the course of said employment, on the date indicated below, she served the following:

- Notice of Hearing and Motion for Allowance and Payment of Compensation and Reimbursement for Special Representation of Debtor and Estate (Siegel, Brill, Greupner, Duffy & Foster, P.A.);
- Proposed Order Allowing Fees; and
- Proof of Service.

on the entities named on the attached service by enclosing true and correct copies of same in an envelope, properly addressed and postage prepaid, and depositing same in the United States mail, unless otherwise noted; and that she certifies the foregoing under penalty of perjury.

Dated: 10-18-04

  
Patricia A. Dooley

**Creditor list for: 2-90781**

Return to Previous Page

Debtor Name **JAMCOINTERNATIONALINC, ;** Chapter **7**

Creditor	ID #
MORTON FAMILY LTD PARTNERSHIP CO MARK SELTERMAN 4301 HWY 7 STE 100 ST LOUIS PARK MN 55418	5991064
MORTON FAMILY LIMITED PARTNERSHIP CO MARK SALITERMAN 4301 HWY 7 SUITE 100 ST LOUIS PARK MN 55416	5990979
JAMES MACHEN 11631 WELTERS WAY EDEN PRAIRIE MN 55347	5531412
LAWRENCE P MAROFSKY 7022 BROOKLYN BLVD BROOKLYN CENTER MN 55429	5478081
JAMES MACHEN 11631 WELTERS WAY EDEN PRAIRIE MN 55347	5455318
PAIGE AND PIETA ART STONE CO THOMAS J FLYNN 7900 XERXES AVE S STE 1600 BLOOMINGTON MN 55431	5445749
MAHLEGA ABSHARAFAT AKA MALLIE SHARAFAT CO THOMAS J FLYNN 7900 XERXES AVE S STE 1600 BLOOMINGTON MN 55431	5445744
CREATIVE FINE ARTS INC CO THOMAS J FLYNN 7900 XERXES AVE S STE 1600 BLOOMINGTON MN 55431	5445736
MALLIE SHARAFAT CO THOMAS J FLYNN 7900 XERXES AVE S STE 1600 BLOOMINGTON MN 55431	5445731
PAIGE & PIETA ART STONE CO THOMAS J FLYNN 7900 XERXES AVENUE SOUTH SUITE 1600 BLOOMINGTON MN 55431	5445394
MAHLEGA ABSHARAFAT AKA MALLIE SHARAFAT CO THOMAS J FLYNN	

7900 XERXES AVENUE SOUTH SUITE 1600 BLOOMINGTON MN 55431	5445390
CREATIVE FINE ARTS INC CO THOMAS J FLYNN 7900 XERXES AVENUE SOUTH SUITE 1600 BLOOMINGTON MN 55431	5445382
MALLIE SHARAFAT CO THOMAS J FLYNN 7900 XERXES AVENUE SOUTH SUITE 1600 BLOOMINGTON MN 55431	5444300
MALLIE SHARAFAT 6595 PEACHTREE INDUSTRIAL BOULEVARD NORCROSS GA 30092	5443821
MALLIE SHARAFAT 6595 PEACHTREE INDUSTRIAL BOULEVARD NORCROSS GA 30092	5443791
JOHNSON WEST CO PLC 336 ROBERT STREET NORTH SUITE 1400 ST PAUL MN 55101	5443790
US TRUSTEE 300 S FOURTH ST ROOM 1015 MINNEAPOLIS MN 55415	5432709
MAHLEGA ABDSHARAFAT/VICTORIA FRAME INC /CREATIVE FINE ARTS INC/ASM REAL ESTATE CO CREATIVE FINE ARTS 6595 PEACHTREE INDUSTRIAL BLVD NORCROSS GA 30092	5423964
AMERICAN EXPRESS PO BOX 29-7879 FT LAUDERDALE FL 33329-7879	5423943
CENTERPOINT ENERGY MINNEGASGO 800 LASALLE AVE MPLS MN 55402	5387955
LAKE REGION MANUFACTURING INC C/O T CHRIS STEWART DUNKLEY BENNETT CHRISTENSEN & MADIGAN PA 701 4TH AVE S STE 700 MINNEAPOLIS MN 55415	5337070
STATE OF MN-DEPT OF REVENUE COLLECTION DIVISION-BKY SECTION PO BOX 64447 ST PAUL MN 55164-0447	4986643
JOHNSON WEST & CO PLC	

CLIFFORD LOZINSKI 336 ROBERT ST N 1400 ST PAUL MN 55101	4890333
ASSOCIATED BANK MN CO THE GURSTEL LAW FIRM PA 401 N THIRD ST STE 590 MINNEAPOLIS MN 55401	4865371
SMALL BUSINESS ADMINISTRATION CO CARLSON SERVICES CORP 120 BROADWAY 19TH FLOOR DEPT 503/504 LOANS NEW YORK NY 10271	4858018
ASSOCIATED BANK OF MINNESOTA 7760 MINNESOTA CENTER BLOOMINGTON MN 55435	4858015
CARVER COUNTY AUDITOR CARVER CO GOVERNMENT CTR 600 E FOURTH ST CHASKA MN 55318	4827053
CARVER COUNTY MICHAEL FAHEY JUSTICE CENTER, GOVERNMENT CENTER 600 E FOURTH ST CHASKA MN 55318-2188	4826863
FIRST NATL BANK OF CHASKA CO THOMAS SEYMOUR MELCHERT HUBERT SJODIN PLLP 121 W MAIN ST STE 200 WACONIA MN 55387-1023	4764219
FIRST NATL BANK OF CHASKA 301 CHESTNUT ST CHASKA MN 55318	4758122
CARVER COUNTY TAX 600 E 4TH ST CHASKA MN 55318	4758121
ROBIN C CAMPBELL 248 HOLLY RD HOPKINS MN 55343	4758120
SECURITIES and EXCHANGE COMM BANKRUPTCY SECTION 500 W MADISON No. 1400 CHICAGO IL 60661	4717627
DIVISION CORP REGULATION SECURITIES & EXCHANGE COMM 450 5TH ST NW WASHINGTON DC 20549	4717626

INTERNAL REVENUE SERVICE STOP 5700 BKY 316 N ROBERT ST ST PAUL MN 55101	4717625
MN DEPT OF REVENUE BANKRUPTCY SECTION PO BOX 64447 ST PAUL MN 55164	4717624
STATE OF MINNESOTA DEPT OF MANPOWER SERVICES 390 N ROBERT ST ST PAUL MN 55101	4717623
UNITED STATES ATTORNEY 600 US COURTHOUSE 300 S 4TH ST MINNEAPOLIS MN 55415	4717622
UNITED STATES TRUSTEE 1015 US COURTHOUSE 300 S 4TH ST MINNEAPOLIS MN 55415	4717621
CARVER COUNTY SHERIFF CARVER COUNTY COURTHOUSE CHASKA MN 55318	4717620
RELIANT ENERGYMINNEGASCO 800 LASALLE AVENUE MINNEAPOLIS MN 55402-2013	4717619
RELIANT ENERGYMINNEGASCO 800 LASALLE AVENUE MINNEAPOLIS MN 55402-2013	4717618
MINOLTA CORPORATION CO THE GURSTEL LAW FIRM PA 401 NORTH THIRD STREET SUITE 600 MINNEAPOLIS MN 55401	4717617
MERCEDES-BENZ CREDIT CORP PO BOX 685 ROANOKE TX 76262-0685	4717616
MBNA PO BOX 15021 WILMINGTON DE 19850	4717615
JOHNSON WEST & CO 1400 PIONEER BUILDING ST PAUL MN 55064	4717614

HOWARD MILLER CLOCK CO CO THE GURSTEL LAW FIRM 401 NORTH THIRD STREET SUITE 600 MINNEAPOLIS MN 55401	4717613
CITY OF CHASKA UTILITIES ONE CITY HALL PLAZA CHASKA MN 55318	4717612

**U S Bankruptcy Court - District of Minnesota**  
**Page design last revised: December 26, 2002**



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In Re:

Bky. No. 02-90781

Jamco International, Inc.,

Chapter 7 Case

Debtor.

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**ORDER ALLOWING FEES**

This case came before the Court on the motion of M. Gregory Simpson and Siegel, Brill, Greupner, Duffy & Foster, P.A., for allowance and payment of compensation and reimbursement of expenses for its special representation of debtor and debtor's estate. Appearances, if any, were noted on the record. Based on the application and the file, record and proceedings herein,

**IT IS HEREBY ORDERED:**

1. Siegel, Brill, Greupner, Duffy & Foster, P.A. is allowed compensation in the amount of \$19,487.50 and reimbursement of costs in the amount of \$51.10 for a total allowed amount of \$19,538.60.

2. The Debtor by its trustee is authorized and directed to disburse to Siegel, Brill, Greupner, Duffy & Foster, P.A., the total allowed amount stated in the previous paragraph.

Dated: \_\_\_\_\_, 2004.

**BY THE COURT:**

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Gregory F. Kishel  
Chief U.S. Bankruptcy Judge